

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.

Case No. 4:20-cv-05640-YGR

Plaintiff, Counter-defendant

**[PROPOSED] ORDER RE:
COUNTERCLAIMANT APPLE INC.'S
ADMINISTRATIVE MOTION TO SEAL**

v.

APPLE INC.,

The Honorable Yvonne Gonzalez Rogers

Defendant, Counterclaimant

Pursuant to Civil Local Rule 79-5, Counterclaimant Apple Inc. (“Apple”) has filed an Administrative Motion to Seal (the “Administrative Motion”). In support, Apple filed the accompanying declaration of Mark A. Perry.

Having considered the Administrative Motion, all associated declarations, exhibits, and any argument of counsel, and for good cause appearing:

IT IS HEREBY ORDERED that Counterclaimant’s Administrative Motion is **GRANTED**. Accordingly,

(1) The un-redacted versions of the documents sought to be partially sealed by the Administrative Motion shall remain under seal;

(2) The public shall only have access to the versions of the partially sealed documents sought to be sealed by the Administrative Motion in which portions the following sections have been redacted:

Category 1: Apple’s Request as to Information that Reflects its Competitively Sensitive Internal Billing Policies, Processes, and Systems

Portion of Document Sought to be Sealed	Document Title	Reason to Seal
10:4	Apple Inc.’s Reply In Support Of Its Motion For Entry Of Judgment On Its Indemnification Counterclaim (the “Reply”)	Reflects information regarding Apple’s confidential, internal billing policies and procedures.
10:6	Reply	Reflects information regarding Apple’s confidential, internal billing policies and procedures.
10:7–8	Reply	Reflects information regarding Apple’s confidential, internal billing policies and procedures.
1:14–15	Supplemental Declaration Of Mark Rollins In Support Of Apple Inc.’s Motion For Entry Of Judgment On Its Indemnification Counterclaim (the “Rollins Supplemental Declaration”)	Reflects information regarding Apple’s confidential, internal billing policies and procedures.
1:17–21	Rollins Supplemental Declaration	Reflects information regarding Apple’s confidential, internal billing policies and procedures.
2:3–4	Rollins Supplemental Declaration	Reflects information regarding Apple’s confidential, internal billing policies and procedures.

2:6	Rollins Supplemental Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
2:9	Rollins Supplemental Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.

Category 2: Apple's Request as to Information that Reflects Apple's Financial Information Relating to Costs Expended by Apple in the *Epic* Litigation and the *Cameron* and *Pepper* Litigation¹

Portion of Document Sought to be Sealed	Document Title	Reason to Seal
10:8–9	Reply	Reflects non-public financial information regarding Apple's aggregate costs for its litigation expenses in the <i>Cameron and Pepper</i> litigation.
1:22	Rollins Supplemental Declaration	Reflects non-public financial information regarding Apple's aggregate costs for its litigation expenses in the <i>Cameron and Pepper</i> litigation.

IT IS SO ORDERED.

Dated: _____, 2024

The Honorable Yvonne Gonzalez Rogers
United States District Court Judge

¹ Donald Cameron v. Apple Inc., 4:19-cv-3074-YGR (Cameron) and In Re Apple iPhone Antitrust Litigation, 4:11-cv-6714-YGR (Pepper).